

**To:** Rodriguez, Dante[Rodriguez.Dante@epa.gov]  
**From:** Jeryl Gardner  
**Sent:** Wed 1/3/2018 8:50:03 PM  
**Subject:** RE: Site Management/Transition Plan - brainstorming call, Dante's notes

[a.stevens@ndep.nv.gov](mailto:a.stevens@ndep.nv.gov)

Good productive call today!

Thanks,

Jeryl R. Gardner, P.E., C.E.M.

Supervisor, Abandoned Mine Lands Branch

Bureau of Corrective Actions, NDEP  
901 S. Stewart St., Ste 4001  
Carson City, NV 89701  
775-687-9484  
[jgardner@ndep.nv.gov](mailto:jgardner@ndep.nv.gov)



**From:** Rodriguez, Dante [mailto:Rodriguez.Dante@epa.gov]  
**Sent:** Wednesday, January 3, 2018 12:36 PM  
**To:** Jeryl Gardner <JGARDNER@ndep.nv.gov>; Jonathan Zittel <jzittel@ndep.nv.gov>; Dave Davis (drdavis@blm.gov) <drdavis@blm.gov>; Seter, David <Seter.David@epa.gov>  
**Subject:** Site Management/Transition Plan - brainstorming call, Dante's notes

Please send me Angela's contact information. Thanks!

-Dante

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**MONTHLY STATUS MEETING: NDEP-EPA/BLM**

**DATE:** 1/3/18

**PARTICIPANTS:** Dante Rodriguez (EPA), Dave Davis (BLM)

Jeryl Gardner (NDEP), Jonathon Zittel (NDEP), Angela Stevens (NDEP)

Confidential information in purple.

Updates in blue and purple.

Previous periods' information in gray or light purple.

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**OU0. SITEWIDE:**

- **Agreements/Enforcement.**
  - MOU (YPT, WRPT). Possibility of continued discussions/negotiations after deferral.
  - Deferral Agreement. Would be done. No further action.
  - AOC. Governs ARC work, includes workplans, schedules etc. Use and refer to often. Make a schedule/gantt chart of deliverables, tracking mechanism, reviews periods, etc. Select software tool to use. Make a 3-month look-ahead chart. Review with project team monthly (establish monthly call).
- **Community Involvement.**
  - CIP. Draft, EPA team reviewed, Sarah hasn't shared with workgroup yet. EPA hand-off draft to NDEP. NDEP reviews and edits, finalizes CIP. Deferral Agreement mentions overall CI needs. AOC has some wording re: CI, role of ARC (assist with public meetings, etc.).
  - Initial Outreach: press releases (BLM not thinking of doing one independently), webpage updates, then Community Meeting (1-2 months after deferral). EPA has provided Roll-out Strategy, including key messages (Jeryl will forward to DaveD).
  - Ongoing Community Meetings. Specify in CIP, more often than annually.

- **SharePoint Site.**
  - Transition. EPA funding Aptim to continue until NDEP takes over. Aptim has 6 hours per month budget. NDEP-ARC discuss transition period. NDEP estimates within 3 months from deferral to get SP contract in place, want to have transfer complete within 1 month thereafter. EPA funding Aptim to assist with transfer to NDEP.
  - Document chronology. EPA funded Aptim to complete the entering document dates into metadata by hand, currently about halfway done.
- **Other/General.**
  - Monthly Site-wide Report. ARC will continue preparing, will submit to NDEP instead of EPA.
  - Site Management/Transition Plan. Today's brainstorming session, Dante will share notes with team. NEXT STEPS?
  - NDEP document storage, electronic and physical, to be improved. Working on scanning hard-copy documents.
  - Monthly coordination calls. NDEP take over from EPA, upon deferral. Coordinate, take notes (use Dante's format for now), etc. Both Dante and DaveS to be included (DaveD too). Jeryl sent out agency calls invitations through April. Dante had sent invitations for ARC calls – shift that to Jeryl upon deferral (Dante delete his, Jeryl send new one). NDEP and tribes? NDEP to decide how to handle ongoing coordination.

## **OU1. Groundwater:**

- **Remedial Investigation Report.** Draft RI review. Aptim collating comments from reviewers, expect late 1<sup>st</sup> week Jan, NDEP separately submitting its comments same time or next week.
- **Plume Stability.**
  - EPA testing model, preparing for initial call with agencies. CBI assisted by putting data into spreadsheet format. Dave: EPA conducted initial runs, had contractor clean-up spreadsheet, Herb to re-run, timing uncertain. DaveS update and plan for where to take this?
  - EPA involvement in discussions re: monitoring optimization, etc, document review.
- **Risk Assessment.** EPA ongoing involvement? (Review workplan? Just draft final document? Submit comments to NDEP only, or also participate in discussions?). NDEP complete takeover and responsibility to oversee ARC.
- **Feasibility Study-Proposed Plan.** EPA ongoing involvement? Same question as above.
- **Bottled water.**
  - EPA orders to ARC, closing out? Would completely release ARC responsibility, which would create need to communicate with tribe etc. AOC provisions for bottled water? Jeryl not certain, thought so. NDEP goal to get everyone off bottled water, 10-20 hold-outs not including tribe.
  - EPA was going to wait until RI final before make decision about tribe's bottled water.

- EPA was going to assist ARC with outreach to residents still on bottled water. EPA received from Jack the list of users connected to system, etc., will review, includes homeowner information, not for release, something around 12 homes not yet hooked up, some stuck in probate, some refusals.

### **OU3. Process Area:**

- **Remedial Investigation.** Dave issued approval letter. Hand-off to NDEP now.
- **Risk Assessment.**
  - HHRA workplan. YPT comments. Dave issued letter to ARC, ongoing discussion via emails and calls, plan to extend ARC deadline to early March (? NDEP to decide) for workplan revisions.
  - SLERA draft. March 6 deadline for deliverable, to NDEP.

### **OU4a. Evaporation Ponds:**

- **Data Results.** ARC submitted evaluation report. Aptim compiling comments, DaveS will check with Acree/Ford about comments, then schedule conference call with ARC, maybe December, be prepared to discuss needed additional field work and objectives. Question of whether existing data is sufficient or additional is needed. NDEP will involve EPA in decision.

**OU7. Wabuska Drain:** Lead role for non-tribal land goes to NDEP. NDEP will take over coordination of meetings/calls after deferral.

- **Phase 1.**
  - **Technical Issues** (background, agriculture, and further sampling). ARC looked at agriculture information sources. Statisticians discussed background statistics. Dante sent list of information not yet provided. ARC working on ag evaluations, to submit in CSM update early Jan, agencies need to review/scrutinize, coordinate and discuss before responding to ARC, plan on that being NDEP-lead after deferral.
  - HHRA/ERA. ARC wants to resolve background questions first.
- **Phase 2 – between Ph1 area and YPT reservation.**
  - Strategy to continue pressing ARC to perform additional sampling, fall-back to have NDEP perform. Awaiting ag evaluation consideration.
- **YPT sampling.**
  - **Data Results.** McGinnis working on data report, Dante obtained lab reports, shared with NDEP and ARC, Aptim to compile, review, evaluate in parallel with ARC. Balance having ARC evaluate, Aptim and/or Dietrick. Adding scope to Aptim, workplan is being revised now, negotiating price etc. Plan to get them started with

work ASAP.

- **North of YPT.**
  - Strategy to have Aptim evaluate existing data (sediment, surface water, groundwater), adding scope to task order. Submit our input to NDEP.
- **Walker River and Weber Reservoir.**
  - Held technical call with ARC, Dante sent out notes. EPA conducted initial brainstorming with Ned Black, Sophia Serda and Aptim. Strategy to have CBI evaluate data, recommend next steps.
- **Peripheral Components.** Data from early OU3 investigation, group agreed that data should be included in OU-4a risk assessment.
- **Rail Spur.**
  - CH2M drafted sampling plan. EPA approved, submitted to NDEP. NDEP plans to hold until strategically good time to address with ARC.
  - EPA to do sulfur studies applicable to both OU7 and OU1/OU8, Hill do one sampling plan for all but not field work, obligated funds.

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#### OU8. Arimetco:

- **Enhanced Evaporation.** Buttoned-up for winter. Monitoring of evaporation pan atop VLT heap is in weekly monitoring report.
- **Free Use Permit.** NDEP submitted application for borrow material, to be used as cover, outside site boundary but on BLM public land, requires EA/EIS. NDEP meeting next week with BLM. DaveD: Singatse not willing to part with site material for remediation. ARC finished off-site testing.
- ARC started discussions with BLM on potentially buying the public land within mine property, handled at District office. DaveD noted Ralph Thomas retirement.
- **Ongoing O&M.** Covered under new AOC, NDEP oversight. ARC continue to do weekly pond level reports. Monthly as well. Will be addressed to NDEP after deferral, with EPA as cc along with others.
- **Remedial Design/Remedial Action.** What does EPA want to do re: involvement in order to make its determination of protectiveness.

#### Other OUs/Closure Management Units:

EPA involvement? How to interact, review information in order to make its determination of protectiveness. Various OUs will be combined into CMUs at the FS stage. NDEP will inform EPA (and BLM) of forthcoming documents, EPA can determine which it wants to review.

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**Dante Rodriguez**

Remedial Project Manager

U.S. EPA Region 9

75 Hawthorne Street, SFD-8-2

San Francisco, CA 94105

(415)972-3166